

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

**IN RE:**

**CASE NO.: 20-40324-EJC**

**Reginald Leonard Merckerson,  
Debtor.**

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**CHAPTER 13**

**OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

COMES NOW, U.S. Bank National Association, Not Individually But Solely As Trustee For Bluewater Investment Trust 2017-1 hereinafter referred to as ("Movant"), who holds a secured lien on the Debtor's real property known as 1912 East 57<sup>th</sup> Street, Savannah, Georgia 31404 and files this Objection to Confirmation of Debtor's Plan.

The Plan intends to pay-off the loan in full due to Secured Creditor, however, the figures used by the Debtor are inaccurate. The Plan proposes to pay only \$41,795.00 at an interest rate of 5.25%. Upon information and belief, the secured claim held by the first mortgage has an anticipated payoff of \$52,937.85. Therefore, the Plan cannot be confirmed. Secured Creditor objects to any plan which proposes to pay it anything less than \$52,937.85 as the total payoff over the life of the Plan. Accordingly, the Chapter 13 Plan fails to comply with the provisions of 11 U.S.C. § 1325(a). Additionally, the Chapter 13 Plan fails to delineate that the Debtor will now be responsible for maintenance of property taxes and insurance.

WHEREFORE, Movant prays that this Court inquire into the matters raised herein and deny confirmation of the Chapter 13 Plan or enter such orders that the Court deems just and proper.

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By: /s/Andrea Betts  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on May 29, 2020, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

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